

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al., ¹)	Case No. 01-01139 (AMC)
)	(Jointly Administered)
Reorganized Debtor.)	
)	Hearing Date: May 1, 2023 at 10:00 a.m.
)	Objection Deadline: March 21, 2023 at 4:00 p.m.

**NOTICE OF REORGANIZED DEBTOR'S MOTION TO APPROVE SETTLEMENT
AGREEMENT RESOLVING STATE OF MONTANA'S REMAINING CLAIM 18496-1**

To: (i) The Office of the United States Trustee; (ii) Counsel for the WRG Asbestos PI Trust; (iii) Counsel for the Asbestos PI Future Claimants Representative; (iv) Counsel for the Asbestos PD Future Claimants Representative; (v) Counsel for the WRG Asbestos PD Trust (7A); (vi) Counsel for the WRG Asbestos PD Trust (7B); (vii) Counsel for the CDN ZAI PD Claims Fund; (viii) Those parties that requested service and notice of papers in accordance with Fed. R. Bankr. P. 2002; (ix) Counsel for the State; and (x) counsel for EPA.

On January 10, 2023, the Reorganized Debtor filed the *Reorganized Debtor's Motion to Approve Settlement Agreement Resolving State of Montana's Remaining Claim 18496-1* (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court"). A true and correct copy of the Motion is attached hereto. Responses or objections to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern time) on March 21, 2023.

At the same time, you must also serve a copy of the objections or responses, if any, upon the following:

¹ W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") is the sole remaining "Reorganized Debtor," and Case No. 01-1139 is the sole remaining open chapter 11 case.

- (i) Counsel for the Reorganized Debtor, Roger J. Higgins, Esq., The Law Offices of Roger Higgins, LLC, 516 North Ogden Ave., Suite 136, Chicago, IL 60642, and Laura Davis Jones, Esq. and James E. O'Neill, Esq., Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, PO Box 8705, Wilmington, DE 19899-8705 (Courier 19801);
- (ii) The Office of the United States Trustee, Richard L. Schepacarter, Esq., U.S. Department of Justice, Office of the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801;
- (iii) Counsel for the WRG Asbestos PI Trust, Marla Rosoff Eskin, Esq., Campbell & Levine, LLC, 222 Delaware Avenue, Suite 1620, Wilmington, DE 19801, and Philip E. Milch, Esq., Campbell & Levine, LLC, 310 Grant Street, Suite 1700, Pittsburgh, PA 15219;
- (iv) Counsel for the Asbestos PI Future Claimants Representative, John C. Phillips, Jr., Esq., Phillips, Goldman, McLaughlin & Hall, P.A., 1200 North Broom Street, Wilmington, DE 19806;
- (v) Counsel for the Asbestos PD Future Claimants Representative, R. Karl Hill, Esq., Seitz, Van Ogtrop & Green, P.A., 222 Delaware Avenue, Suite 1500, P.O. Box 68, Wilmington, DE 19899, and Alan B. Rich, Esq., Attorney and Counselor, 4244 Renaissance Tower, 1201 Elm Street, Dallas, TX 75270;
- (vi) Counsel for the WRG Asbestos PD Trust (7A), Richard B. Schiro, WRG Asbestos PD Trust, c/o Wilmington Trust, Attn: Corporate Trust Administration, 1100 N. Market Street, Wilmington, DE 19890-1625, and Deborah D. Williamson, Esq., Dykema Cox Smith, 112 E. Pecan Street, Suite 1800, San Antonio, TX 78205;
- (vii) Counsel for the WRG Asbestos PD Trust (7B), Edward B. Cottingham, Jr., Esq., The Cottingham Law Firm, 317 Wingo Way, Suite 303, P.O. Box 810, Mt. Pleasant, SC 29465, and M. Dawes Cooke, Esq., Barnwell Whaley Patterson & Helms LLC, P.O. Drawer H, Charleston, SC 29402; and
- (viii) Counsel for the CDN ZAI PD Claims Fund, Daniel K. Hogan, Esq., The Hogan Firm, 1311 Delaware Avenue, Wilmington DE 19806, and Yves Lauzon, Esq., Michel Belanger, Esq., Lauzon Belanger Lesperance Inc., 286, Rue St-Paul Ouest, Bureau 100, Montreal, Quebec, H26 2A3 Canada.

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE OBJECTION WILL BE

HELD BEFORE THE HONORABLE ASHELY M. CHAN BY ZOOM ONLY, ON **MAY 1, 2023, AT 10:00 A.M. EASTERN STANDARD TIME.** ZOOM INSTRUCTIONS WILL BE FORTHCOMING.

Dated: January 10, 2023

THE LAW OFFICES OF ROGER HIGGINS, LLC
Roger J. Higgins
516 N. Ogden Ave.
Suite 136
Chicago, IL 60642
Telephone: (312) 480-1984

and

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
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Co-Counsel for the Reorganized Debtor

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